

IN THE UNITED STATES DISTRICT COURT
FOR THE Southern District of Texas
CORPUS CHRISTI DIVISION

United States Courts
Southern District of Texas
FILED

APR 14 2022

Nathan Ochsner, Clerk of Court

Hector Pacheco-Morales
TDCJ# 2257486
Plaintiff,

v.

BRYAN Collier, et al.,
Defendants,


Civil Action NO. 2:21-CV-00147

MEMORANDUM

1. Plaintiff respectfully asks this honorable court to review this civil suit under Americans with Disabilities Act 42 USC. §§ 12101-12213. Plaintiff is a 24 hour psychic monitoring for his medication that he takes after the sexual assault and retaliations he's been experiencing. He also has a Aortic Mechanical Heart valve which he is classified 24 hour monitoring and Polychemist VERA.
2. Plaintiff originally filed under Section 1983 that is on Pro Per. Under Federal ADA is most proper, As most all of ~~his~~ ^{Plaintiff's} claims is under Medical he was prescribed Lovenox to get his ~~in~~ ^{up} to the Range his blood needs to be or his mechanical heart valve won't function properly or risk of stopping completely.
3. Plaintiff was picked up from Hospital Galveston and released by Hospital staff even though there's notation not to release plaintiff as the hospital is best suited for the administration/modulation of Lovenox. All that it did was lead to the Near Death incident. McConnell is a 24 hour unit but it's a Max unit. Plaintiff is a 53/62 trustee offender. ~~Ad 800~~ was/is in proper housing for Lovenox injections and plaintiff needs of bleeding was unanswered because there was no staff to take him to infirmary which was deliberate indifference to plaintiff medical needs.

Plaintiff respectfully asks this honorable court to review under the Americans with Disabilities Act 42 USC. §§ 12101-12213.

SIGNED at Beaumont, Texas 11th of April, 2022


Hector Pacheco-Morales, Pro SE
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